

**III. Remarks**

Claims 1-6, 8-14, 16-22, 24 and 25 are pending in the present application. Claims 1, 9, 17 and 25 are amended as described below in section III.A and as set forth above. Claim 5 has been amended to correct a typographical error by replacing a period (.) with a comma (,). Claims 26-30 have been added, examination of which is requested.

All pending claims stand rejected. Reconsideration and withdrawal of the rejections are respectfully requested.

**A. Claims 1-4, 9-12 and 17-20**

The Action rejects independent Claim 1 and dependent Claims 2-4 as being obvious from U.S. Patent No. 5,581,682 to Anderson et al. (hereinafter, Anderson). With respect to Claim 1, Applicants submit that the Applicants and the Examiner differ little as to the teachings of Anderson. However, Applicants believe that the Examiner and the Applicant have a different understanding of what is being claimed. For that reason, Claim 1 has been amended to recite the step of “creating an electronic output file, said identified content not present in said output file, a redacted document being producible from said output file for display”, with the goal of clarifying that the output file that may be used to create the redacted document does not include the redacted content. As described hereafter, Applicants believes this recited step clarifies Applicants’ claimed invention and materially distinguishes Applicants’ claimed redaction method from that of Anderson.

The term “output file” in Claim 1 was amended to “electronic output file” to emphasize the distinction between the output file and the document produced by processing the output file with a software application. Amended Claim 1 clarifies that the electronic output file created by Applicants’ method is devoid of the content from the original document that has been identified for redaction. This output file, which is an electronic file (e.g., a PDF file), can then be used to

produce a redacted document without the content. For example, in a PDF data stream corresponding to the original document to be redacted, the data corresponding to the identified content are actually removed from the PDF data stream to create a new output file. This data cannot be retrieved from the created output file because the data no longer exist. Because the content is not included in the output file, the content is not displayed in the redacted document and, importantly, cannot be retrieved from the output file. As described hereafter, although Anderson may achieve the same ultimate result from a viewer's perspective, i.e., a redacted document, Anderson's methodology is materially different from Applicants' claimed method.

Applicants submit that the Examiner has conceded that Anderson achieves its redaction capabilities by using overlays. Anderson represents the document, specifically an individual page to be annotated or redacted, as a data stream consisting of objects. These objects correspond to content on the page. The key difference between the methodology of Anderson and Applicants' claimed method, however, is that Anderson "builds upon this data stream by adding an include structure within the page portion of the data stream. . . . When an image representing a page of the document is to be annotated, a reference to the overlay is created in the include structure." (Column 3, Lines 41-48) (emphasis added). Applicants believe the same process is employed for both redaction as annotation. Therefore, in the process of Anderson, rather than removing data corresponding to content that is to be redacted, Anderson adds content to the data stream as an inclusion object. During presentation of the annotated or redacted document, the inclusion objects are retrieved from the data stream and used to create overlays on the document image. (Column 3, Lines 50-54). Importantly, the data stream of the original document remains completely intact, except for the inclusion objects, thereby preserving the integrity of the original document.

The size of the created file of Anderson – the file including the inclusion objects – grows in size with each annotation because the original data stream must be preserved and stored along with each inclusion object. It can be seen by comparing Tables I, II and III, which correspond to

the original data stream and the data stream including inclusion objects for creating the page of FIGS. 3A and 4, respectively, that all of the original content is preserved in the output file created by Anderson. Indeed, Anderson explains that “[t]he result is that the data stream for the final form object remains unchanged, however the file containing the final form document and the annotation is expanded as each annotation is added.” (Column 6, Lines 45-49)

In summary, Anderson describes what is considered a “tethered” method. The annotation/redaction information is retained in addition to all of the original content. At the time of presentation to the user, the annotation/redaction information needs to be processed to alter the presentation of the page to the intended user. In contrast, Applicants claim an untethered method that requires no processing to alter the page appearance at the time of presentation to the user. This approach provides distinct advantages in displaying, delivering and archiving the redacted document.

From the foregoing, it should be apparent that because Anderson preserves all of the content from the original document, it does not produce an output file where “the identified content [is] not present in said output file.” Again, it is important to note that Applicants are not claiming in this step that the content is not in the redacted document (which it is not), but rather that the content is not present in the output file that can be used to create the redacted document.

Still further, an express object of Anderson is to be able to annotate/redact a document while maintaining “the documents integrity.” (Column 2, Lines 20-25). Indeed, Anderson explains that “[w]ith both annotation and redaction, the contents of the original, underlying document as archived is not changed.” (Column 2, Lines 43-45). This is because the annotation or redaction objects are simply merged into the document data stream. (Column 2, Lines 27-28). Therefore, Anderson clearly teaches away from a redaction method as claimed by Applicants where the output file is created where the content has actually been removed from the output file, when compared with the original file corresponding to the document.

Therefore, it is respectfully submitted that Claim 1 is not obvious from the art of record and is in allowable form. Claims 2-4 depend from Claim 1 and are also allowable. Reconsideration and withdrawal of this rejection are respectfully requested.

Like Claim 1, Independent Claims 9 and 17 both recite the creation of an output file where the identified content is not present in the output file and a redacted document is producible from said output file. For at least the reasons set forth above in connection with Claim 1, therefore, it is submitted that Claims 9 and 17, and Claims 10-12 and 18-20, which depend from Claims 9 and 17, respectively, are also allowable. Reconsideration and withdrawal of the rejections of the claims are respectfully requested.

**B. Independent Claims 5, 13 and 21; Dependent Claims 6, 8, 14, 16, 22 and 24**

The Action rejects independent Claim 5 as being obvious from Anderson. Applicants respectfully submit that the Examiner has misinterpreted the nature of what is claimed in Claim 5.

Claim 5 is directed to a method for designating portions of a document for redaction. A geographic region of a document is designated for redaction. The designating step includes manipulating a frame displayed on the documents where content having a geographical location within the frame is visible to the user during the manipulation step. The manipulable frame is shown, for example, as window 45 in FIG. 2 of Applicants' disclosure. It should be understood that the designating step is not a step of displaying the redacted documents, but rather a means of identifying areas for redaction.

It appears from a reading of the rejection that the Examiner is focusing on the actual annotated document of Anderson, as opposed to the actual method Anderson uses to designate areas for annotation/redaction. Indeed, the Examiner cites to Figures 3A-3B and 4 of Anderson, which show the display of annotated documents having annotation windows overlayed onto the

document. The portion of Anderson's disclosure upon which we must focus is how the system of Anderson enables the user to add the overlays, not the actual display. Anderson provides merely that the user can specify the characteristics and content of the annotation, including location, size and orientation, by a "command entry or a pull down menu." (Column 6, Lines 16-20). This is the only disclosure provided by Anderson regarding creation of the overlays. This dearth of disclosure clearly does not teach or suggest, as recited in Claim 1, "wherein said step of designating [a geographic region of the document for redaction] comprises manipulating a frame displayed on the document, content having a geographical location within said frame being visible to the user during said step of manipulation" as claimed. In summary, the "command entry and pull down menu" do not teach or suggest that a frame is displayed to a user, with content visible in the frame, to assist in designating content to be redacted. It is submitted, therefore, that Claim 5, and Claims 6 and 8, which depend from Claim 5, are allowable over the art of record. Reconsideration and withdrawal of the rejection are respectfully requested.

Like Claim 5, Independent Claims 13 and 21 both recite the manipulation feature for designating a geographic region of a document for redaction. For at least the reasons set forth above in connection with Claim 5, therefore, it is submitted that Claims 13 and 21, and Claims 14 and 16 and 22 and 24, which depend from Claims 13 and 21, respectively, are also allowable. Reconsideration and withdrawal of the rejection of these claims are respectfully requested.

**C. Claim 25**

The Action rejects Claim 25 as being obvious from Anderson. Claim 25 has been amended to clarify that the step of designating comprises designating all geographic regions containing particular content selected by a user for batch designation. Batch designation permits a particular content item, such as a particular word in text, to be designated for redaction at each occurrence. This batch designation is thus an automatic designation for redaction of an item of information. For example, a government document may be subject to FOIA disclosure, so long

as the name of a certain individual is removed. The individual's name could be selected for batch designation. Nothing in Anderson suggests batch designation. The Examiner relies upon the disclosure of Anderson teaching a default setting allowing a user to view all annotations on a page for teaching the batch feature. The designating step is not a display step, but rather a step of identifying what content is to be redacted. Further, the possible addition of more than one annotation per page does not constitute batch designation for redaction, particularly in view of the clarification that "particular content selected by the user" is batch designated. Also, the teaching of a state register set if the default is for a user to view all annotations does not teach or suggest batch designation of particular content for redaction.

For at least these reasons, it is submitted that Claim 25 is allowable over the art of record. Reconsideration and withdrawal of this rejection are respectfully requested.

**D. New Claim 26-30**

Claims 26-30 have been added, examination of which are respectfully requested. Claim 26 is directed to a specific embodiment where the document is in PDF format. Claims 27-30 depend from independent Claims 25, 1, 9 and 17, respectively, and recite an embodiment where the information identifying step is performed by displaying all or a portion of the document and by manipulating a frame displayed on the document, content having a geographic location within said frame being visible to the user during said step of manipulation.

**IV. Conclusion**


In view of the foregoing remarks and amendments, Applicants submit that this application is in condition for allowance at an early date, which action is earnestly solicited.

In the event that the Examiner does not find the claims to be in allowable format, Applicants respectfully request that the Examiner contact the undersigned to discuss the proposed rejection before issuing any substantive office action so that resolution of the application may be expedited.

The Commissioner for Patents is hereby authorized to charge any additional fees or credit any excess payment that may be associated with this communication to deposit account **04-1679**.

Respectfully submitted,

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